

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: ASHRAFUL M. ISLAM

: NO. 21-10190 AMC

DEBTOR'S ANSWER TO MOTION OF EXCEL FINANCIAL CORPORATION
FOR RELIEF FROM AUTOMATIC STAY

1. Admitted.
2. No response is required.
- 3-7. Admitted.
8. No response is required.
9. Admitted.
10. Admitted.
11. No response is required, as the judgment speaks for itself.
12. No response is required as the statements of this paragraph constitute legal argument.
13. Admitted that execution was issued on the judgment on or about the stated date.
14. Admitted.
15. Admitted.
16. Admitted.
17. Denied. While principal and interest are admitted to be owed, debtor denies that he owes the fees averred in this paragraph. By way of further denial, movant has overstated debtor's obligation by an amount of \$29,000 for a credit owed to debtor on the account which movant has failed to include in its calculations.
18. Admitted that no payments have been made directly by debtor to movant, but debtor's full obligation to movant has been included in his Chapter 13 plan and debtor is making his plan payments.
19. Denied. Movant has not specified the rate of interest or the nature of any charges it claims, and therefore, no further denial can be made by debtor.
- 20-24. No response is required as the statements in these paragraphs are legal arguments.
25. Denied. Debtor has filed an adequate Chapter 13 Plan.

26. Denied. Debtor is making his plan payments.

27-29. Denied. Debtor has filed a legal challenge to the tax sale in state court, although it is admitted that the tax sale occurred.

30. Denied. There are no grounds for relief from the automatic stay as requested by movant.

WHEREFORE, debtor prays your Honorable Court to deny the within motion, and directing movant to pay debtor's reasonable counsel fees incurred in opposing this motion.

/s/_____

CHARLES W. CAMPBELL

Attorney for Debtor

1 East Airy Street

Norristown, PA 19401

Phone: (610) 272-2400

Email: cwcampbell3@gmail.com

I.D. No. 37206